U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

JUN 27 1988

REPLY TO
ATTN OF: HW-112

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dennis Redington
Monsanto Company
800 North Lindbergh
St. Louis, MO 63166

Re: Notice of Violation and Warning, and Request for Information
Environmental Protection Agency Identification Number WAD009282302

Dear Mr. Redington:

This Notice of Violation and Warning is being issued to the Monsanto Company (hereafter Monsanto) based on findings from an United States Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) inspection conducted on March 31, 1988 at Rhone-Poulenc, Inc. facility (formerly a Monsanto facility) located in Seattle, Washington. Based on the findings from the inspection and on information gathered during subsequent investigation, Monsanto is in violation of the Washington State Department of Ecology (Ecology) Dangerous Waste Regulations (and the equivalent RCRA regulations).

The violation is due to Monsanto failing to implement the requirements of WAC 173-303-805(7)(d) [40 CFR Section 270.72(d)]. Specifically, Monsanto had failed to comply with the interim status financial requirements of 40 CFR Part 265 Subpart H (as referenced in WAC 173-303-400). According to WAC 173-303-805(7)(d), the old owner or operator (Monsanto) shall comply with the interim status financial requirements of 40 CFR Part 265 Subpart H (as referenced in WAC 173-303-400) until the new owner or operator has demonstrated to Ecology that he is complying with the financial requirements. To date, the new owner (Rhone-Poulenc, Inc) has not demonstrated compliance with the financial requirements.

In order to correct this violation, Monsanto must implement and complete all applicable provisions of the above referenced financial requirements within thirty days of receipt of this letter. Also, within this same thirty day period, Monsanto must submit all documentations including all pertinent attachments thereto, which show the violation is corrected.